

"UNDER SEAL"

FEB 21 2024

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

US DISTRICT COURT  
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA ) DOCKET NO. 3:24-cr-35-MOC  
)  
v. )  
[REDACTED] )  
) **BILL OF INDICTMENT**  
2) JOCELYN MARIE HAMILTON ) Violations:  
3) ELIJAH MCDOWELL ) 21 USC § 846  
4) DARIEN AKIEL BROWN ) 21 USC § 841(a)(1)  
 ) 18 USC § 924(c)(1)(A)  
 ) 18 USC § 2

THE GRAND JURY CHARGES:

**COUNT ONE**

*(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl)*

From a date unknown but no later than in or around June of 2023 and continuing until in or around July of 2023, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

- [REDACTED]  
2) JOCELYN MARIE HAMILTON,  
3) ELIJAH MCDOWELL, and  
4) DARIEN AKIEL BROWN,

did knowingly and intentionally combine, conspire, confederate and agree with each other, and others, both known and unknown to the Grand Jury, to distribute and to possess with intent to distribute quantities of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that, with respect to the conspiracy offense charged in Count One, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, are attributable to, and were reasonably foreseeable by [REDACTED] and 3) ELIJAH MCDOWELL. Accordingly, Title 21, United States Code, Section 841(b)(1)(A) is applicable to [REDACTED] and 3) ELIJAH MCDOWELL.

It is further alleged that, with respect to the conspiracy offense charged in Count One, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, are attributable to, and were reasonably foreseeable by 4) DARIEN

**AKIEL BROWN.** Accordingly, Title 21, United States Code, Section 841(b)(1)(B) is applicable to **4) DARIEN AKIEL BROWN.**

It is further alleged that, with respect to the conspiracy offense charged in Count One, a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, is attributable to, and was reasonably foreseeable by **2) JOCELYN MARIE HAMILTON.** Accordingly, Title 21, United States Code, Section 841(b)(1)(C) is applicable to **2) JOCELYN MARIE HAMILTON.**

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**  
*(Distribution of Fentanyl)*

On or about June 8, 2023, in Mecklenburg County, within the Western District of North Carolina,

**2) JOCELYN MARIE HAMILTON,**

aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance.

1. As to [REDACTED] said offense involved at least 40 grams of a mixture and substance containing a detectable amount of fentanyl. Accordingly, Title 21, United States Code, Section 841(b)(1)(B) is applicable to [REDACTED]
2. As to **2) JOCELYN MARIE HAMILTON**, said offense involved a quantity of a mixture and substance containing a detectable amount of fentanyl. Accordingly, Title 21, United States Code, Section 841(b)(1)(C) is applicable to **2) JOCELYN MARIE HAMILTON.**

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT THREE**  
*(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)*

On or about June 8, 2023, in Mecklenburg County, within the Western District of North Carolina,

[REDACTED]  
in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that being distribution of fentanyl as charged in Count Two of this Bill of Indictment, did knowingly possess a firearm.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT FOUR**  
*(Distribution of Fentanyl)*

On or about June 16, 2023, in Mecklenburg County, within the Western District of North Carolina,

[REDACTED]

**3) ELIJAH McDOWELL,**

aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

1. Said offense involved at least 40 grams of a mixture and substance containing a detectable amount of fentanyl.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT FIVE**  
*(Distribution of Fentanyl)*

On or about June 27, 2023, in Mecklenburg County, within the Western District of North Carolina,

[REDACTED]

**4) DARIEN AKIEL BROWN,**

aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

1. Said offense involved at least 40 grams of a mixture and substance containing a detectable amount of fentanyl.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT SIX**  
*(Distribution of Fentanyl)*

On or about July 13, 2023, in Mecklenburg County, within the Western District of North Carolina,

[REDACTED]  
3) ELIJAH McDOWELL,

aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance.

1. Said offense involved at least 40 grams of a mixture and substance containing a detectable amount of fentanyl.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT SEVEN**  
*(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)*

On or about July 13, 2023, in Mecklenburg County, within the Western District of North Carolina,

[REDACTED]

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that being distribution of fentanyl as charged in Count Six of this Bill of Indictment, did knowingly possess a firearm.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE**

Notice is hereby given of 21 U.S.C. § 853, 18 U.S.C. § 924, and 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Section 853, 924, and/or 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this bill of indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations;
- c. All firearms or ammunition involved or used in such violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendants to the extent of the value of the property described in (a), (b), and (c).

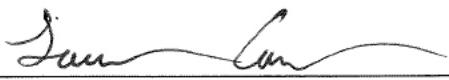
The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

- a. a Glock, model 43, 9mm pistol, S/N: AFLR040 and a Glock, model 42, .380 caliber pistol, S/N: ACTK168 seized July 3, 2023, in the course of the investigation;
- b. a Glock, model 19X, 9mm pistol, S/N: BYMZ906 seized on July 17, 2023, in the course of the investigation;
- c. an AR style pistol, Palmetto State Armory, PA-15, 300 Blk, S/N SCB946648, a Glock, Model 20, 10mm, S/N BDVZ626, 12 rounds of 10mm ammunition, 11 rounds of 300Blk ammunition, and \$1,000 in U.S. Currency seized on July 26, 2023, in the course of the investigation.

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON

DENA J. KING  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
LAWRENCE J. CAMERON  
ASSISTANT UNITED STATES ATTORNEY